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8 **BEFORE THE**
9 **BOARD OF REGISTERED NURSING**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:
12 **TIFFANY DENISE STRONG**
2526 North Douty Street
Hanford, California 93230

Case No. 2013-891

13 **Registered Nurse License No. 660500**
14 **Public Health Nurse Certificate No. 71118**

A C C U S A T I O N

15 Respondent.

16
17 Louise R. Bailey, M.Ed., R.N. ("Complainant") alleges:

18 **PARTIES**

19 1. Complainant brings this Accusation solely in her official capacity as the Executive
20 Officer of the Board of Registered Nursing ("Board"), Department of Consumer Affairs.

21 **Registered Nurse License**

22 2. On or about July 13, 2005, the Board issued Registered Nurse License Number
23 660500 to Tiffany Denise Strong ("Respondent"). The Registered Nurse License was in full
24 force and effect at all times relevant to the charges brought herein. The Registered Nurse License
25 expired on August 31, 2012, and has not been renewed.

26 3. On or about December 14, 2006, the Board issued Public Health Nurse Certificate
27 Number 71118 to Respondent. The Public Health Nurse Certificate was in full force and effect at

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1 all times relevant to the charges brought herein. The Public Health Nurse Certificate expired on
2 August 31, 2012, and has not been renewed.

3 JURISDICTION

4 4. Business and Professions Code ("Code") section 2750 provides, in pertinent part, that
5 the Board may discipline any licensee, including a licensee holding a temporary or an inactive
6 license, for any reason provided in Article 3 (commencing with section 2750) of the Nursing
7 Practice Act.

8 5. Code section 2764 provides, in pertinent part, that the expiration of a license shall not
9 deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or
10 to render a decision imposing discipline on the license.

11 6. Code section 118, subdivision (b), provides, in pertinent part, that the expiration of a
12 license shall not deprive the Board of jurisdiction to proceed with a disciplinary action during the
13 period within which the license may be renewed, restored, reissued, or reinstated.

14 STATUTORY PROVISIONS

15 7. Code section 2761 provides, in pertinent part:

16 The board may take disciplinary action against a certified or licensed nurse or
17 deny an application for a certificate or license for any of the following:

18 (a) Unprofessional conduct, which includes, but is not limited to, the
19 following:

20 (1) Incompetence, or gross negligence in carrying out usual certified or
21 licensed nursing functions.

22 REGULATORY PROVISIONS

23 8. California Code of Regulations, title 16, section 1442, states:

24 As used in Section 2761 of the code, "gross negligence" includes an extreme
25 departure from the standard of care which, under similar circumstances, would have
26 ordinarily been exercised by a competent registered nurse. Such an extreme departure
27 means the repeated failure to provide nursing care as required or failure to provide
28 care or to exercise ordinary precaution in a single situation which the nurse knew, or
should have known, could have jeopardized the client's health or life.

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1 **COST RECOVERY**

2 9. Code section 125.3 provides, in pertinent part, that the Board may request the
3 administrative law judge to direct a licentiate found to have committed a violation or violations of
4 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
5 enforcement of the case, with failure of the licentiate to comply subjecting the license to not being
6 renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be
7 included in a stipulated settlement.

8 **DRUGS**

9 10. "Propoxyphene" is a Schedule IV controlled substance as designated by Health and
10 Safety Code section 11057, subdivision (c)(2), and is a dangerous drug pursuant to Code
11 section 4022.

12 11. "Oxazepam" is a Schedule IV controlled substance as designated by Health and
13 Safety Code section 11057, subdivision (d)(23), and is a dangerous drug pursuant to Code section
14 4022.

15 **BACKGROUND INFORMATION**

16 12. Respondent was employed as a registered nurse at Adventist Health - Central Valley
17 Hospital in Hanford, California ("CVH"), at the time of the events set forth herein.

18 13. On or about July 6, 2010, while working in the emergency room of CVH, Respondent
19 brought a patient who required telemetry monitoring on a gurney from the emergency room to
20 another unit of CVH. Respondent did not inform the unit of the patient's need for telemetry
21 monitoring prior to the transfer. Finding that the telemetry equipment was not ready for the
22 patient when she arrived, Respondent became agitated and aggressive, loudly expressed her
23 impatience and anger, using expletives, and paced the floor in the presence of the patient and her
24 colleagues. After waiting for the telemetry equipment for approximately ten to fifteen minutes,
25 Respondent announced to the head nurse of the unit that she had brought the patient to, that she
26 was leaving the patient to go back to the emergency room and that he could write her up if he
27 wanted to. Respondent then left the patient. Telemetry had not started.

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14. CVH requested that Respondent submit to a drug test, and on or about July 6, 2010, at 5:48 p.m. Respondent provided a blood specimen that tested positive for Propoxyphene and Oxazepam. Respondent failed to provide a prescription for either.

FIRST CAUSE FOR DISCIPLINE

(Gross Negligence)

15. Respondent is subject to discipline pursuant to Code section 2761, subdivision (a)(1), on the grounds of unprofessional conduct, in that on or about July 6, 2010, while working as a registered nurse at Adventist Health - Central Valley Hospital in Hanford, California, Respondent committed acts constituting gross negligence within the meaning of the California Code of Regulations, title 16, section 1442. Specifically, Respondent left a patient who required proper cardiac monitoring before securing such monitoring, as more fully set forth in paragraph 13, above.

SECOND CAUSE FOR DISCIPLINE

(Possessed and Self-Administered a Controlled Substance)

16. Respondent is subject to discipline under Code section 2761, subdivision (a), on the grounds of unprofessional conduct as defined in Code section 2762, subdivision (a), in that on or about July 6, 2010, Respondent committed the following acts:

a. Respondent possessed Propoxyphene and Oxazepam, controlled substances and dangerous drugs, in violation of Code section 4060.

b. Respondent self-administered Propoxyphene and Oxazepam, controlled substances, without direction from a licensed physician and surgeon, dentist, or podiatrist.

THIRD CAUSE FOR DISCIPLINE

(Dangerous Use of Controlled Substances)

17. Respondent is subject to discipline under Code section 2761, subdivision (a), on the grounds of unprofessional conduct as defined in Code section 2762, subdivision (b), in that on or about July 6, 2010, Respondent self-administered Propoxyphene and Oxazepam, controlled substances, as set forth in paragraph 16, subparagraph b, above, to an extent or in a manner dangerous or injurious to herself, any other person, or the public while in the course of her duties

as a registered nurse at Adventist Health - Central Valley Hospital in Hanford, California, as set forth in paragraph 15, above.

FOURTH CAUSE FOR DISCIPLINE

(Unprofessional Conduct)

18. Respondent is subject to discipline pursuant to Code section 2761, subdivision (a), on the grounds of unprofessional conduct, in that on or around July 6, 2010, while working as a registered nurse at Adventist Health - Central Valley Hospital in Hanford, California, Respondent demonstrated unprofessional conduct, as set forth in paragraphs 15 through 17, above, and by demonstrating unprofessional conduct through swearing, yelling, and profanity in front of hospital staff and a patient, as more fully set forth in paragraph 13, above.

PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

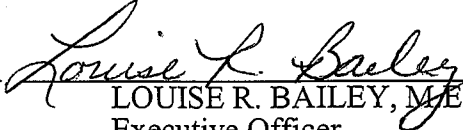
1. Revoking or suspending Registered Nurse License Number 660500, issued to Tiffany Denise Strong;

2. Revoking or suspending Public Health Nurse Certificate Number 71118, issued to Tiffany Denise Strong;

3. Ordering Tiffany Denise Strong to pay the Board of Registered Nursing the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3; and,

4. Taking such other and further action as deemed necessary and proper.

DATED: APRIL 8, 2013


LOUISE R. BAILEY, M.D., R.N.
Executive Officer
Board of Registered Nursing
State of California
Complainant

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